

RM-10867 filed by the ARRL misses on several accounts. Moving Technician Class licensees to General does not take into account that as of July 2000 the streamline restructure of the Amateur Radio Service removed the majority of material related to HF operations by a Technician with morse ability. With that in mind moving these licensees to HF would be premature at best. The study material does not give that individual the background needed to be proficient on HF.

The elimination of morse code requirements for HF access doesn't take into account FCC Rules Part 97 [97.1(a)] where a valuable emergency mode of communications would eventually fade away. Lest not forget the discipline of the amateur radio service comes from the self study and improvement of the individual licensee. Maintaining the 5WPM requirement for HF only serves to increase the self desire to learn a valuable communications method. The choices made thereafter, will be as always to the individuals involved. But, with Amateur Radio possibly serving a broader role in Homeland Security, it's to the Commission's benefit to ensure the pool of trained radio amateurs have as many tools available as possible. Agreed that the majority of commercial licensed services have departed from morse code, the key is they are commercial. The Amateur service is still non-pecuniary in it's structure. Let's keep it that way.

I urge the Commission to deny the ARRL RM-10867 in favor of the RAF proposal RM-10868.